Technical Assistance (TA) Handbook

For Applicants

FY 2022 Continuum of Care NOFO Competition

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Context for the CoC Competition

The Continuum of Care (CoC) Program (24 CFR Part 578) is designed to promote a community-wide commitment to the goal of ending homelessness; to provide funding for efforts by nonprofit providers, States, Indian Tribes or tribally designated housing entities, and local governments to quickly re-house homeless individuals, families, persons fleeing domestic violence, dating violence, sexual assault, and stalking, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless; and to optimize self-sufficiency among those experiencing homelessness.

Each year, the U.S. Department of Housing and Urban Development (HUD) releases a Notice of Funding Opportunity (NOFO), signifying the beginning of a funding competition among approximately 400 CoCs, the community stakeholder groups that guide local responses to homelessness. The information in the NOFO sets forth the competition rules and processes each year.

The CoC Competition Consolidated Application, which each CoC submits to HUD, will consist of three parts:

- The **CoC Application,** which describes the CoC planning body, governance structure, overall performance, and the strategic planning process;
- The **CoC Project Listing**, which ranks the project applications for HUD and identifies any rejected applications, showing the CoC's priorities for funding; and
- A number of **Project Applications**, each of which reflects one project seeking funding.

Before the application is submitted to HUD, the CoC is required to hold a local competition to determine which project applications will be included in the Consolidated Application, along with their relative priority. The results of the local competition dictate which projects the CoC will prioritize.

Project applicants must participate in the local review and rank process and have their project selected for submission with the CoC Consolidated Application in the national competition in order to be eligible for funding. Project applicants must follow local procedures and submit local documents, and also need to prepare for the HUD submission of the project application. HUD requires the use of a web-based application and grants management system called *e-snaps*.

Summary: 2022 NOFO Competition Overview and Funding Available

On August 1, 2022, the U.S. Department of Housing and Urban Development (HUD) released a Notice of Funding Opportunity (NOFO) for the Fiscal Year (FY) 2022 Continuum of Care (CoC) Program competition.

This year there is funding available in four categories:

- **Annual Renewal Demand (ARD) Funding:** This funding supports the CoC's existing housing and services. The CoC has the option to **continue to support** those programs, **or to reallocate** those resources, in whole or in part, to Permanent Supportive Housing, Rapid Rehousing, Joint Transitional Housing/Rapid Rehousing, HMIS, or Supportive Services Only Projects for Coordinated Entry. For Youth Homelessness Demonstration Program (YHDP) communities, ARD also includes YHDP renewal and replacement projects, which are not ranked.
- **CoC Bonus Funding:** This funding also supports Permanent Supportive Housing, Rapid Rehousing, Joint Transitional Housing/Rapid Rehousing, HMIS, or Supportive Services Only Projects for Coordinated Entry.
- **Domestic Violence Bonus (DV Bonus) Funding:** This funding supports Rapid Rehousing, Joint Transitional Housing/Rapid Rehousing, or Supportive Services Only Projects for Coordinated Entry.
- **CoC Planning Funds**: This funding supports CoC planning activities, and only the CoC's named collaborative applicant may apply for it. **The planning grant will not be ranked in the competition and is not competitive with housing or service projects.** As such, this Handbook does not include information about applying for planning grants.

To know exactly how much Annual Renewal Demand Funding or CoC Bonus Funding is available in your community, see your community's application materials.

In 2022, funds are NOT available for:

- Emergency shelter
- Homelessness prevention projects
- New Transitional Housing (except when joint with Rapid Rehousing)
- New Supportive Services Only projects (except coordinated entry)

Ranking and Tiers Explained

As in past years, the funding that CoCs can apply for is divided into tiers, **with projects prioritized in Tier 1 more likely to be funded than projects of lower priority that are placed in Tier 2.**

CoCs are required to either accept and rank, or reject, all projects submitted by project applicants in e-snaps, except CoC planning projects. CoCs are encouraged to consider the policy priorities established in the NOFO in conjunction with local priorities to determine the ranking of projects. All projects must pass HUD's eligibility and threshold requirements to be funded, no matter their priority.

Tier 1

In 2022, the amount of funding available for Tier 1 is equal to 95% of the combined Annual Renewal Amounts for all projects eligible for renewal (minus the annual renewal amounts for YHDP renewal and

YHDP replacement projects, which are not ranked). HUD will conditionally select projects from the highest scoring CoC to the lowest scoring CoC, provided the project applications pass both eligibility and threshold review. Projects should be placed in priority order.

Tier 2

In 2022, Tier 2 is the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds that a CoC can apply for (but does not include YHDP renewal or replacement projects, CoC planning projects, or projects selected with DV Bonus funds). Funding will be determined by the point value of each project application based on a 100-point scale. All Tier 2 projects will be funded in point order.

Tier 2 points are awarded as follows:

- **CoC Score**: Up to 50 of 100 points in direct proportion to the score received on the CoC Application.
- **CoC Project Ranking**: Up to 40 of 100 points for the CoC's ranking of the project application(s). Higher ranked projects get more points.[1]
- **Commitment to Housing First**: Up to 10 of 100 points for the project application's commitment to follow a Housing First approach.
    - *Note*: HMIS projects and Supportive Services Only projects for a centralized or coordinated assessment system will automatically receive 10 points under this factor.

Straddling Tiers

For any projects that straddle the two tiers, the Tier 1 portion will be funded in accordance with Tier 1 processes and the Tier 2 portion will be funded in accordance with Tier 2 processes. HUD may award project funds for just the Tier 1 portion, provided the project is still feasible with the reduced funding (i.e., is able to continue serving homeless program participants effectively).

Reclassification

Because new project applications may be created through the reallocation or bonus processes, if HUD determines that a project applicant or a CoC incorrectly classified one or more new projects as

[1] To consider the CoC's ranking of projects, point values will be assigned directly related to the CoC's ranking of project applications. The calculation of point values will be 40 times the quantity (1-x) where x is the ratio of the cumulative funding requests for all projects or portions of projects ranked higher by the CoC in Tier 2 plus one half of the funding of the project of interest to the total amount of funding available in Tier 2. For example, if a CoC is eligible to apply for projects totaling $500,000 in Tier 2 and applies for 5 projects ranked in Tier 2 of $100,000 each: the highest ranked project would receive 36 points, and then the subsequently ranked projects would receive 28, 20, 12, and 4 points.

reallocation or bonus, HUD may reclassify the project(s) as either reallocation or bonus if the CoC exceeded either its reallocation or bonus amount.

Renewal and Replacement YHDP, CoC Planning, and UFA Costs Projects

As in past years, applications for YHDP renewal, YHDP replacement, CoC planning, and UFA costs will be unranked. CoCs may only submit one application for CoC planning costs and it must be submitted by the Collaborative Applicant that is listed on the CoC Applicant Profile in e-snaps. HUD will conditionally select all CoC planning projects that pass eligibility and threshold review.

Before Applying for a CoC Grant

This Handbook gives an overview of the CoC requirements and this funding opportunity. To ensure a comprehensive understanding and compliance with all CoC requirements, all applicants should read and be familiar with:

- FY 2022 CoC NOFO
- CoC Program Interim Rule

Noteworthy Changes in the 2022 NOFO That May Impact Grant Recipients

- $52,000,000 is available nationally for Domestic Violence Bonus projects ($102,000,000 was available in 2021 because there was no 2020 competition).
- $80,000,000 is available for non-competitive YHDP renewal and replacement expiring grants.
- Tier 1 is equal to 95% of the CoC's Annual Renewal Demand (not 100%, like it was in 2021) and Tier 2 is equal to the difference between Tier 1 and the maximum amount of renewal, reallocation, and CoC Bonus funds that a CoC can apply for.
- Starting in the FY 2021 competition, Tribes and Tribally Designated Housing Entities were eligible to apply for projects through existing CoCs only. In the FY 2022 competition, Tribes or TDHE can form a CoC including only tribal formula areas as part of their geography through the CoC registration process. Additionally, beginning in FY 2022, Tribes and TDHEs can be designated as Collaborative Applicants.
- Projects applying for transition grants will not be limited to only 50% of awarded funds to be used for the costs of eligible activities of the program component originally funded; however, by the end of the operating year, the recipient must be fully operating the new program component.
- HUD revised its rating factors regarding CoC evaluation of racial disparities and for addressing the needs of Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ+) individuals.
- To encourage CoC mergers and mitigate the potential adverse scoring implications that may occur when a high-performing CoC merges with one or more lower-performing CoC(s), HUD will award up to 25 bonus points (up from 15 in 2021) to CoCs that first registered as a merged CoC between the FY 2021 and FY 2022 CoC Program Registration process.

- Involving Individuals with Lived Experience of Homelessness in Service Delivery and Decision Making and Provide Professional Development and Employment Opportunities: in addition to the previous requirements, two additional sections were added. CoCs must demonstrate:
    - Professional development (e.g., internships, continuing education, skill-based training) and employment opportunities are provided to individuals with lived experience of homelessness either within the CoC or by CoC membership organizations
    - Feedback is routinely gathered from people experiencing homelessness and people who have received assistance through the CoC or ESG program on their experience receiving assistance and the steps the CoC takes to address challenges raised by people with lived experience of homelessness
- The point value distribution was revised for new Domestic Violence Bonus project scoring.

HUD's Homeless Policy and Program Priorities

All projects should align with HUD's policy and program priorities, both to increase their likelihood of being funded in this cycle and to ensure that the funding is a good match for the project in the future. CoCs and Project Applications will be evaluated based on the extent to which they further HUD's policy priorities. The policy priorities set forth in this year's NOFO are:

1. **Ending homelessness for all persons**
    a. To end homelessness, CoCs should identify, engage, and effectively serve all persons experiencing homelessness.
    b. CoCs should measure their performance based on local data that consider the challenges faced by all subpopulations experiencing homelessness in the geographic area (e.g., veterans, youth, families, those experiencing chronic homelessness, and people with disabilities, including those living with HIV/AIDS).
    c. CoCs should partner with housing, health care, and supportive services providers to expand housing options, such as permanent supportive housing, housing subsidies, and rapid rehousing.
    d. Additionally, CoCs should use local data to determine the characteristics of individuals and families with the highest needs and longest experiences of homelessness to develop housing and supportive services tailored to their needs.
2. **Use a housing first approach**
    a. Housing First prioritizes rapid placement and stabilization in permanent housing and does not have service participation requirements or preconditions. CoC Program funded projects should help individuals and families move quickly into permanent housing, and the CoC should measure and help projects reduce the length of time people experience homelessness.
    b. Additionally, CoCs should engage landlords and property owners to identify an inventory of housing available for rapid rehousing and permanent supportive housing participants, remove barriers to entry, and adopt client-centered service methods.

c. HUD encourages CoCs to assess how well Housing First approaches are being implemented in their communities.

3. Reducing unsheltered homelessness

a. In recent years, the number of people experiencing unsheltered homelessness has risen significantly, including a rising number of encampments in many communities across the country. People living unsheltered have extremely high rates of physical and mental illness and substance use disorders.

b. CoCs should explore all available resources, including CoC and ESG funded assistance, housing subsidies, and supportive services to provide permanent housing options for people who are unsheltered.

4. **REVISED in 2022** Improving system performance

a. CoCs should be using system performance measures (e.g., average length of homeless episodes, rates of return to homelessness, rates of exit to permanent housing destinations) to determine how effectively they are serving people experiencing homelessness.

b. Additionally, CoCs should use their Coordinated Entry process to promote participant choice, coordinate homeless assistance and mainstream housing and services to ensure people experiencing homelessness receive assistance quickly, and make homelessness assistance open, inclusive, and transparent.

c. CoCs should review all projects eligible for renewal in FY 2022 to determine their effectiveness in serving people experiencing homelessness, including cost-effectiveness.

d. CoCs should also look for opportunities to implement continuous quality improvement and other process improvement strategies.

e. HUD recognized the effects of COVID-19 on CoC performance and data quality and reduced the points available for rating factors related to system performance in the FY 2021 CoC NOFO. This FY 2022 CoC NOFO significantly increases the points available for system performance rating factors.

5. Partnering with housing, health, and service agencies

a. Using cost performance and outcome data, CoCs should improve how all available resources are utilized to end homelessness. This is especially important as the CARES Act and American Rescue Plan have provided significant new resources to help end homelessness.

b. HUD encourages CoCs to maximize the use of mainstream and other community-based resources when serving persons experiencing homelessness and should:

(1) Work closely with public and private healthcare organizations and assist program participants to obtain medical insurance to address healthcare needs. This includes developing close partnerships with public health agencies to analyze data and design approaches that reduce homelessness, improve the health of people experiencing homelessness, and prevent and address disease outbreaks, including HIV/AIDS.

(2) Partner closely with PHAs and state and local housing organizations to utilize coordinated entry, develop housing units, and provide housing subsidies to

people experiencing homelessness. These partnerships can also help CoC Program participants exit permanent supportive housing through Housing Choice Vouchers and other available housing options. CoCs and PHAs should especially work together to implement targeted programs such as Emergency Housing Vouchers, HUD-VASH, Mainstream Vouchers, Family Unification Program Vouchers, and other housing voucher programs targeted to people experiencing homelessness. CoCs should coordinate with their state and local housing agencies on the utilization of new HOME program resources provided through the Homelessness Assistance and Supportive Services Program that was created through the American Rescue Plan;

(3) Partner with local workforce development centers to improve employment opportunities; and

(4) Work with tribal organizations to ensure that tribal members can access CoC-funded assistance when a CoC's geographic area borders a tribal area.

6. ****Updated in 2022**Racial equity**

   a. In nearly every community, Black, Indigenous, and other people of color are substantially overrepresented in the homeless population. HUD is emphasizing system and program changes to address racial equity within CoCs.

   b. Responses to preventing and ending homelessness should address racial inequities to ensure successful outcomes for all persons experiencing homelessness using proven approaches, such as: developing a coordinated community response created in partnership with a racially diverse set of stakeholders and people experiencing homelessness and partnership with organizations with experience serving underserved populations.

   c. CoCs should review local policies, procedures, and processes with attention to identifying barriers that result in racial disparities, and taking steps to eliminate barriers to improve racial equity and to address disparities.

7. ****NEW in 2022** Improving Assistance to LBGTQ+ Individuals**

   a. Discrimination on the basis of gender identity or sexual orientation manifests differently for different individuals and often overlaps with other forms of prohibited discrimination. CoCs should address the needs of LGBTQ+, transgender, gender non-conforming, and non-binary individuals and families in their planning processes.

   b. Additionally, when considering which projects to select in their local competition to be included in their application to HUD, CoCs should ensure privacy, respect, safety, and access regardless of gender identity or sexual orientation in projects. CoCs should also consider partnering with organizations with expertise in serving LGBTQ+ populations.

8. **Persons with lived experience**

   a. HUD is encouraging CoCs to include in the local planning process people who are currently experiencing or have formerly experienced homelessness to address homelessness.

   b. People with lived experience should determine how local policies may need to be revised and updated to improve the effectiveness of homelessness assistance programs,

including participation in planning and oversight activities and developing local competition processes. .

c. CoC leaders and stakeholders should also prioritize hiring people who have experienced homelessness in areas where their expertise is needed (e.g., peer outreach and support).

9. ****NEW in 2022** Increasing Affordable Housing Supply**

   a. The lack of affordable housing is the main driver of homelessness. CoCs play a critical role in educating local leaders and stakeholders about the importance of increasing the supply of affordable housing and the specific consequences of the continued lack of affordable housing.

   b. CoCs should be communicating with jurisdiction leaders, including for the development of Consolidated Plans, about the harmful effects of the lack of affordable housing, and they should engage local leaders about steps such as zoning and land use reform that would increase the supply of affordable housing.

   c. This FY2022 CoC NOFO awards points to CoCs that take steps to engage local leaders about increasing affordable housing supply.

New Project: Designing Your Project

There are two things to keep in mind when preparing your application:

1. Ensuring your application is competitive for funding in your CoC's local competition,
2. Ensuring the project you are applying for is eligible for HUD funding and compliant with HUD requirements.

We are focusing on the second one here.

Eligible New Projects Funding Options

New projects may apply for three funding streams:

- Reallocation of funding for renewal projects
- CoC Bonus funding, or
- Domestic Violence (DV) Bonus funding.

Projects may also apply for a combination of Reallocation and CoC Bonus funding.

Requirements, eligibility, amounts and processes differ among the types of funding, so potential applicants should consider each carefully. Usually, but it may vary by CoC, all new permanent housing projects are evaluated using the same criteria.

Eligible Applicants

- Non-profit organizations

- States
- Local governments
- Instrumentalities of State and local governments
- Public housing agencies
- Tribes and Tribal Entities

HUD will NOT evaluate applications from ineligible applicants (including for-profit entities and individuals).

HUD will also review each eligible applicant's capacity to do the work.

Options for New Project Funding

New Projects Created by Reallocation or Bonus, or Combination of Both

Applicants may apply for **reallocated funds** from renewal projects or **CoC Bonus** funding or a **combination of reallocated funds and CoC Bonus funding** for**:**

1. New Permanent Supportive Housing (PH-PSH) projects for either: (i) persons experiencing chronic homelessness at the time they initially enroll or (ii) persons who meet the definition of DedicatedPLUS (defined in Section III.B.2.g of the NOFO)

   In general, a DedicatedPLUS PH-PSH projects can serve individuals, households with children, and unaccompanied youth (including pregnant and parenting youth) that, at intake, are:

   - Chronically homeless
   - Living in a transitional housing project that is closing and were chronically homeless at entry to the TH project
   - Living unsheltered, in emergency shelter, or safe haven and (1) were admitted in a permanent housing project in the past year but could not maintain the housing and (2) were chronically homeless at entry to the PSH project
   - Living in transitional housing funded by a Joint TH and PH-RRH component project and were experiencing chronic homelessness
   - Living in a place not meant for human habitation, Safe Haven, or emergency shelter currently and for at least 12 months in the last three years, but not on four separate occasions and the individual or head of household meet the definition of 'homeless individual with a disability; or
   - Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

2. New Rapid Re-housing (PH-RRH) projects to serve homeless individuals and families

3. Joint TH and PH-RRH component projects, which will include transitional housing and permanent housing-rapid rehousing in a single project, to serve homeless individuals and families
4. New dedicated Homeless Management Information System (HMIS) project (can only be carried out by the HMIS lead)
5. New Supportive Services Only (SSO-CE) project to develop or operate a centralized or coordinated entry system

Domestic Violence Bonus (DV Bonus)

Applicants may apply for **Domestic Violence Bonus** funding for projects dedicated to survivors of domestic violence, dating violence, or stalking who qualify under paragraph (4) of the definition of homeless at 24 CFR 578.3, for the following project types:

1. Rapid Re-housing (PH-RRH) projects that follow a housing first approach.
2. Joint TH and PH-RRH component projects that follow a housing first approach.
3. Supportive Services Only Projects for Coordinated Entry (SSO-CE) to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of survivors of domestic violence, dating violence, sexual assault, or stalking (e.g., to implement policies and procedures that are trauma-informed, client-centered or to better coordinate referrals between the CoC's coordinated entry and the victim service providers coordinated entry system where they are different).

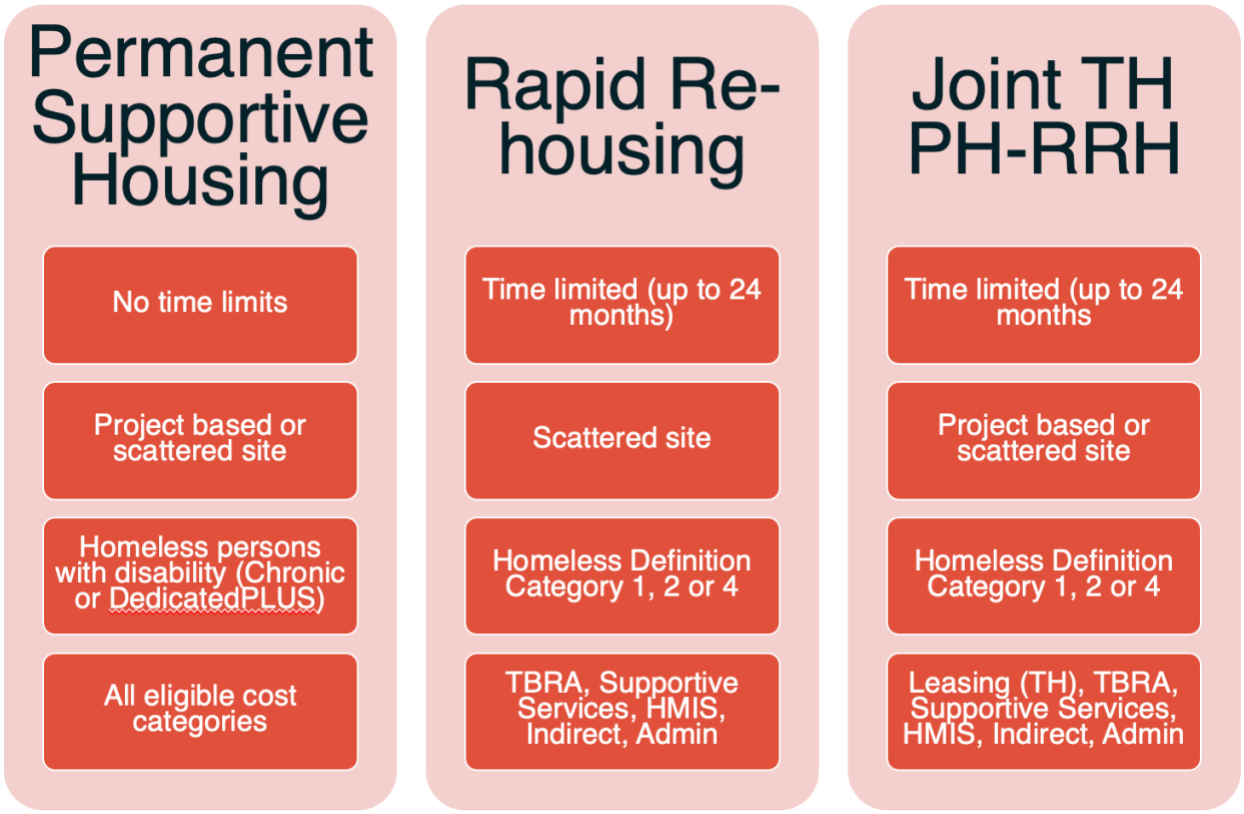
For additional information on applying for and the scoring and ranking for DV Bonus Projects, please click HERE.

Special Focus: Expansion Projects (through Reallocation, Bonus, or DV Bonus)

A renewal project applicant may submit a new project application to **expand its current CoC-funded operations** by adding units, beds, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-Coordinated Entry projects.

For additional information on applying for an Expansion Project, please click HERE.

Options for New Project Types



Permanent Supportive Housing for Chronically Homeless or DedicatedPLUS populations (Bonus or Reallocation)

- ***Permanent supportive housing (PSH)* component** projects provide permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.
- Project must select program participants consistent with the CoC's Coordinated Entry process and must serve either:
  - Persons experiencing chronic homelessness at the time they initially enroll in the project (defined in 24 CFR 578.3), OR
  - A DedicatedPLUS population (defined in Section III.B.2.g of the NOFO)
- While eligible costs may be impacted by your local competition rules, the NOFO allows for grant funds to be used for (see "Eligible Costs/Activities Overview"):
  - Acquisition

- Rehabilitation
- New Construction
- Leasing
- Operations
- Rental Assistance
- Supportive Services
- HMIS
- Indirect Costs
- Administration

- Project should use a Housing First approach.
- Housing may be single site or scattered sites and can be integrated with affordable or market-rate units.
- Services must be offered. Services may vary depending on residents' needs.
- Lease is required; must be renewable, for a term of at least one year, and terminable only for cause.
- Through threshold scoring, HUD encourages that the type of housing will meet the needs of program participants, that supportive services be offered to program participants to ensure successful retention in or help to obtain permanent housing, that participants are individually assisted to obtain mainstream benefits, and that participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (e.g., provides the participant with some type of transportation to access needed services, safety planning, case management, additional assistance to ensure retention of permanent housing).

Rapid Re-Housing (Bonus, Reallocation or DV Bonus)

- ***Rapid re-housing (RRH) component*** projects emphasize housing search and relocation services and short- and medium-term tenant-based rental assistance to move homeless persons and families (with or without a disability) as rapidly as possible into permanent housing and achieve stability in that housing.
- Project must select program participants consistent with the CoC's Coordinated Entry process and must serve certain populations:
  - Projects applying for Bonus or Reallocation funding must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.
  - Projects applying for DV Bonus funding must serve survivors of domestic violence, dating violence, sexual assault, or stalking who are defined as homeless at 24 CFR 578.3.

- Grant funds may be used for (see "Eligible Costs/Activities Overview"):
  - Short term (up to 3 months) and/or medium-term (3-24 months) tenant-based renal assistance
  - Supportive Services
  - HMIS
  - Indirect Costs
  - Administration
- Lease is required; must be renewable, for a term of at least one year (regardless of the length of assistance provided), and terminable only for cause.
- Project must:
  - Follow a Housing First approach
  - Limit rental assistance to no more than 24 months per household.
  - Limit supportive services to no more than 6 months after rental assistance stops.
  - Re-evaluate at least once per year whether the project participant continues to lack the resources and support networks necessary to retain housing without CoC assistance.
  - Offer supportive services (may include any eligible CoC Program supportive service). Project participants should have access to a wide array of supportive services designed to help them retain stable, long-term housing.
  - Require project participants to meet with a case manager at least monthly. *(Project is exempt if the Violence Against Women Act or the Family Violence Prevention and Services Act prohibit the recipient from making housing conditional on the participant's acceptance of services.)*
  - Follow CoC written policies for:
    - Determining and prioritizing eligible families
    - Determining the amount or percentage of rent that each project participant must pay
- Project may (if aligned with written standards adopted by the CoC in consultation with ESG recipients in the CoC's geographic area and administered consistently across all projects):
  - Set a maximum amount or percentage of rental assistance that a project participant may receive.
  - Set a maximum number of months (up to 24 months) that a project participant may receive rental assistance.
  - Set a maximum number of times that a project participant may receive rental assistance.

- Require project participants to share in the costs of rent.

- Through threshold scoring, HUD encourages that the type of housing will meet the needs of program participants, that supportive services be offered to program participants to ensure successful retention in or help to obtain permanent housing, that participants are individually assisted to obtain mainstream benefits, and that participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (e.g., provides the participant with some type of transportation to access needed services, safety planning, case management, additional assistance to ensure retention of permanent housing).

Joint TH and PH-RRH (Bonus, Reallocation or DV Bonus)

- ***Joint TH and PH-RRH component*** project combines two existing program components–transitional housing and permanent housing-rapid rehousing–in a single project to serve individuals and families experiencing homelessness.

- Project must adopt a Housing First approach across the entire project and program participants may only receive up to 24-months of total assistance.

- Project must select program participants consistent with the CoC's Coordinated Entry process and must serve certain populations:

  - Projects applying for CoC Bonus or Reallocation funding must serve persons who qualify as homeless under paragraphs (1), (2), or (4) of 24 CFR 578.3.

  - Projects applying for DV Bonus funding must serve survivors of domestic violence, dating violence, sexual assault, or stalking who are defined as homeless at 24 CFR 578.3.

- Grant funds may be used for (see "Eligible Costs/Activities Overview"):

  - Leasing of a structure or units and operating costs to provide transitional housing;

  - Short term (up to 3 months) or medium-term (3-24 months) tenant-based rental assistance

  - Supportive services

  - HMIS

  - Project administrative costs

- When a program participant is enrolled in a Joint TH and PH-RRH component project, the recipient or subrecipient must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the PH-RRH component, to all participants.

- A program participant may choose to receive only the transitional housing unit or the assistance provided through the PH-RRH component, but the recipient or subrecipient must make both types of assistance available.

- If CoC Program funds are not being requested for both TH and PH-RRH units, the project application must still describe the number of TH and PH-RRH units that will be utilized by the project from another funding source, if selected for conditional award, and provide details in the project description of how TH and PH-RRH assistance will be provided.
- The program should provide enough rapid re-housing assistance to ensure that at any given time a program participant may move from transitional housing to permanent housing. This may be demonstrated by identifying a budget that has twice as many resources for the rapid re-housing portion of the project than the TH portion, by having twice as many PH-RRH units at a point in time as TH units, or by demonstrating that the budget and units are appropriate for the population being served by the project.
- Through threshold scoring, HUD encourages that the type of housing will meet the needs of program participants, that supportive services be offered to program participants to ensure successful retention in or help to obtain permanent housing, that participants are individually assisted to obtain mainstream benefits, and that participants are assisted to obtain and remain in permanent housing in a manner that fits their needs (e.g., provides the participant with some type of transportation to access needed services, safety planning, case management, additional assistance to ensure retention of permanent housing).

Dedicated Homeless Management Information System (HMIS) (Bonus or Reallocation)

- HMIS Component Project: HUD requires each CoC to designate an information system to comply with data collection requirements. HMIS supports CoC functioning, reporting and recordkeeping, centralized or coordinated assessment, and performance measurement.
- Grant funds may be used for (see "Eligible Costs/Activities Overview"):
  - HMIS
  - Indirect Costs
  - Administration
- The CoC's HMIS Lead Agency is the only agency that can apply for this funding.
- If the CoC has organizations within its geographic area that are victim service providers, the HMIS Lead, or subrecipient, may request HMIS funds for a comparable database. Victim service providers may also request HMIS funds in their project application budgets to enter data into a comparable database.

Supportive Services Only Project for a Centralized or Coordinated Assessment System (BONUS, Reallocation, OR DV Bonus)

- Supportive Services Only- Coordinated Entry (SSO-CE) component projects allow recipients and subrecipients to provide services to homeless individuals and families not residing in housing operated by the recipient.
- Centralized or coordinated assessment system is defined to mean a centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.
- In addition to HUD's definition of Centralized or Coordinated Assessment at 24 CFR 578.3, CPD-17-01: Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System, establishes the requirements related to the development and use of a centralized or coordinated entry assessment system. These systems help communities assess the needs of program participants and effectively match individuals and families experiencing homelessness with the most appropriate resources available to address their supportive service and housing needs.
- Applicants may also apply for DV Bonus funding for new Supportive Service Only-coordinated entry projects to implement policies, procedures, and practices that equip the CoC's coordinated entry to better meet the needs of survivors of domestic violence, dating violence, sexual assault, or stalking.
- Grant funds may be used for (see "Eligible Costs/Activities Overview"):
  - Supportive services
  - Indirect Costs
  - Administration.

Replacement YHDP Projects

For information on Replacement YHDP projects see Section V.B.4.a.(5) on pages 38-44 of the CoC NOFO.

Renewal YHDP Projects

- HUD has decided to non-competitively renew or replace expiring YHDP grants; however, these project applications will be reviewed for compliance with project eligibility, project quality, and if applicable, project renewal thresholds. See Sections II.B.11.d, II.B.11.f, and V.B.4.a.(5) of the NOFO for additional information.
- **Replacement.** The Consolidated Appropriations Act, 2022 permits the renewal or replacement of YHDP projects under the CoC Program; therefore, a renewing YHDP project may choose to replace its current program project with a new project which may include activities ineligible under the CoC Program, or portions of its current program design, to conduct activities that are ineligible with CoC Program funds provided the replacement project demonstrates it will directly address youth homelessness. Please see pp. 38-44 of the NOFO for more details on the

replacement application process, eligible replacement project types, and eligible special YHDP activities.

- **Project Quality Threshold.** YHDP replacement project applications will be considered as having met project quality threshold requirements if the project application activities and costs are eligible under the NOFO. If a YHDP replacement project application is not for activities and costs that are eligible under the NOFO, it will not be rejected under this project quality threshold and HUD will work with the project applicant to correct or revise information submitted after the final FY 2022 award announcement before executing the grant agreement.
- **Match.** YHDP renewal or replacement projects will not be required to meet the 25% match requirement if the applicant is able to demonstrate it has taken reasonable steps to maximize resources available for youth experiencing homelessness.
- **Grant Term.** All YHDP renewal and YHDP replacement project applications are limited to a one-year grant term and one year of funding with one exception: any renewal permanent housing project that receives project-based rental assistance or operating costs may request up to a 15-year grant term (however, project applicants may only request one year of funding). The grant term may be extended consistent with 2 CFR 200.308 and 2 CFR 200.309. Additionally, YHDP replacement projects cannot request capital costs (i.e., new construction, acquisition, or rehabilitation).
- **Consolidation, Expansion, and Reallocation.** While YHDP projects can use the consolidation process as outlined in Section II.B.6 and V.B.4.a.(7) of the NOFO, these projects cannot consolidate with non-YHDP projects. YHDP projects cannot use the expansion (Section III.B.2.j) or reallocation (Section III.B.2.x) processes outlined in the NOFO.
- **Eligible Participants.** YHDP renewal projects must serve youth, age 24 or younger, who qualify as homeless under paragraph (1), (2), and (4) of 24 CFR 578.3, including unaccompanied, pregnant, and parenting youth, where no member of the household is older than 24. Additionally, these projects may serve youth aged 24 and under who qualify as homeless under paragraph (3) of 24 CFR 578.3 if the CoC is approved to serve persons in paragraph (3).

New Project Design Requirements

Funding Levels & Limits

Each year's Notice of Funding Opportunity (NOFO) states how the funding amount is to be calculated. This year, these rules apply:

- New project applications must request the full Fair Market Rents (FMR) amount per unit.
- HUD will adjust leasing, operating, and rental assistance budget line items based on changes to the FMR. All adjustments will be made prior to award announcement.
- If the recipient has a subrecipient (and is not a UFA), it is required to share at least 50 percent of project administrative funds with its subrecipient(s).

Timeliness

- Proof of site control, match, environmental review, and the documentation of financial

feasibility must be completed within 12 months of the announcement of the award, or 24 months in the case of funds for acquisition, rehabilitation, or new construction. The 12-month deadline may be extended by HUD for up to 12 additional months upon a showing of compelling reasons for delay due to factors beyond the control of the recipient or subrecipient.

- For recipients of funds for rehabilitation or new construction:
    - Construction activities must begin within 9 months of the later of signing of the grant agreement or of signing an addendum to the grant agreement authorizing use of grant funds for the project.
    - Construction activities must be completed within 24 months of signing the grant agreement.
    - Activities that cannot begin until after construction activities are completed must begin within 3 months of the date that construction activities are completed.
- In order to expend funds within statutorily required deadlines, applicants funded for new sponsor-based and project-based rental assistance must execute the grant agreement and begin providing rental assistance within 2 years. However, HUD strongly encourages all rental assistance to begin within 12 months of award. Applicants unable to begin within 12 months should consult with the local HUD CPD Field Office.

Initial Funding Term

- New projects (except for projects requesting capital costs) may request funding for a 1-year grant term (but in some cases, can also apply for a 2-, 3-, 4-, 5-, or 15-year grant). However, the following exceptions apply:
    - HUD will allow new projects to request 1 year of funding with a longer initial grant term not to exceed 18 months. HUD has determined that most new projects requesting 1 year of funding normally take approximately 3 to 6 months to begin fully operating the new project (e.g., hiring staff, developing partnerships with landowners if leasing or renting). Therefore, a new project requesting 1 year of funding may request a grant term of 12 months to 18 months that will allow for the additional start- up process.
    - Any new project that requests tenant based rental assistance may request a 1-, 2-, 3-, 4-, or 5 year grant term. Any new project that requests leasing costs (either leasing only or leasing plus other costs) may request up to a 3-year grant term.
        - Any new project that requests project-based rental assistance or sponsor-based rental assistance, or operating costs may request up to a 15-year grant term; however, the project applicant may only request up to 5 years of funds. Funding for the remainder of the term is subject to availability.
    - Any new expansion project that is submitted to expand an eligible renewal CoC Program-funded project may only request a 1-year grant term, regardless of the project type.

- New CoC Planning and UFA Costs Projects are limited to 1-year grant terms and 1-year of funding. Youth Homeless Demonstration Program (YHDP) replacement projects may only request 1-year of funding.
- Any new project that is requesting consideration under the DV Bonus (see Sections II.B.5 and III.B.2.h of this NOFO for more information) may only request a 1-year grant term, regardless of project type (but may request a longer initial grant term up to 18 months in alignment with the first bullet above).
- Any new project that requests new construction, acquisition, or rehabilitation must request a minimum of a 3-year grant term and may request up to a 5-year grant term.

- A new project requesting, for example, $300,000 would receive the full amount for a one-year grant, $150,000 each year for a two-year grant, and $100,000 each year for a three-year grant, and so on. If considering a longer-term grant, please review the NOFO or consult with Homebase Local Team members for grant term requirements.

Match Requirement

- See match requirements , match ideas, and model match letter.

New Project Threshold Requirements

For new projects, the review process considers applicant and subrecipient eligibility and capacity, project eligibility, and project quality as part of the threshold review. Additionally, to receive funding for a new project, except those created through reallocation, the CoC must demonstrate that projects are evaluated and ranked based on the degree to which they improve the CoC's system performance.

Project Eligibility Threshold: HUD will review eligibility threshold requirements on a pass/fail standard, and if standards are not met, the project will be rejected from the competition.

Applicants and subrecipients must:

- Be eligible under the CoC Program
- Demonstrate the financial and management capacity and experience to carry out the project and to administer Federal funds
- Submit required certifications
- Propose an eligible population for the project type, as designated by the CoC Program Interim Rule and the NOFO
- Agree to participate in HMIS (except for victim service providers who must use a comparable database and planning/UFA grant recipients)

Project Quality Threshold: HUD will review all new project applications to determine if they meet project quality threshold requirements. If awarded, a recipient is required to meet all the criteria listed for its component. The housing and services proposed must be appropriate to the needs of the program participants and the community. **For detailed threshold information by project type, please click HERE.**

HUD will not award funds to a new project unless the project was created through reallocation, or the CoC has demonstrated to HUD's satisfaction that projects are evaluated and ranked based on the degree to which they improve the CoC's system performance.

Other threshold requirements:

- Project applicants and potential subrecipients must have satisfactory capacity, drawdowns, and performance for existing grant(s), as evidenced by timely reimbursement of subrecipients, regular drawdowns, and timely resolution of any monitoring findings, however, this does not apply to project applicants who have never received a CoC Program funded project.
- For expansion projects, project applicants must clearly articulate the part of the project that is being expanded. Additionally, the project applicants must clearly demonstrate that they are not replacing other funding sources.
- Project applicants must demonstrate they will be able to meet all timeliness standards per 24 CFR 578.85.
- HUD reserves the right to deny the funding request for a new project, if the request is made by an existing recipient that HUD finds to have significant issues related to capacity, performance, or unresolved audit/monitoring finding related to one or more existing grants; or does not routinely draw down funds from eLOCCS at least once per quarter. Additionally, HUD reserves the right to withdraw funds if no APR is submitted on the prior grant.
- All projects must have a UEI number and active registration in SAM.
- Evidence of the issues related to the following may prevent an award from being granted to otherwise successful applicants. Detailed information on each requirement is posted on HUD's Funding Opportunities Page
    - Resolution of Civil Rights Matters
    - Outstanding Delinquent Federal Debts
    - Debarments and/or Suspensions
    - Pre-selection Review of Performance
    - Sufficiency of Financial Management System
    - False Statements
    - Mandatory Disclosure Requirement
    - Conducting Business in Accordance with Ethical Standards/Code of Conduct
    - Prohibition Against Lobbying Activities
    - Equal Protection for Faith-based in HUD Programs and Activities.

Renewal Projects Requirements

To be eligible for renewal funding:

- The application must be approved by the CoC for submission in this NOFO.
- The applicant must have an executed grant agreement by December 31, 2022, and the current grant must expire between January 1 and December 31, 2023.
- The applicant must be the entity that signed the expiring grant agreement with HUD.

Other Types of Grant Options for Renewals in 2021: Transition Grants, Consolidations, Expansion Grants

In addition to renewing their current grant, renewal applicants can choose to:

- Transition the renewal project to another CoC Program component (eliminating the gap between contracts when CoCs have allowed agencies to 'reallocate to themselves' in past competitions),
- Consolidate several grants through the application process thereby avoiding a lengthy grant amendment process, or
- Expand the renewal grant (as described in Special Focus: Expansion Projects).

Transition Grants

Applicants may transition renewal projects from one CoC Program component (e.g., Transitional Housing to Rapid Rehousing, Rapid Rehousing to Permanent Supportive Housing) to another using the CoC Program Competition upon approval of the CoC. Additional information regarding transition grants is HERE.

Consolidated Projects

- Eligible renewal project applicants may consolidate two but no more than ten eligible renewal projects into one project application during the application process**.** To be eligible for consolidation, renewal projects *must:*
    - Have a grant period that will expire in the Calendar Year (CY) 2023, as confirmed on the FY2022 Final GIW;
    - Be consolidated under the same recipient, and;
    - All have the same component and project type (i.e. PH-PSH, PH-RRH, Joint TH/PH-RRH, TH, SSO, SSO-CE or HMIS).
- **If you are interested in consolidating projects, please contact Homebase to discuss the process further.** Additional information on Consolidated Grants is available HERE.

Expansion Projects

- A renewal project applicant may submit a new project application under the DV Bonus, reallocation, and CoC bonus processes to expand its current operations by adding units, beds, persons served, services provided to existing program participants, or to add additional activities to HMIS and SSO-Coordinated Entry projects within the CoC's geographic area. See Special Focus: Expansion Projects.

Eligible Costs for Renewal Projects

All renewal projects must submit an application that reflects the same costs and amounts as are listed on the Grant Inventory Worksheet for that grant. Those costs may include:

1. Acquisition
2. Rehabilitation
3. New Construction
4. Leasing
5. Rental Assistance
6. Supportive Services
7. Operating Costs
8. HMIS
9. Project Administration

See also Indirect Costs.

Threshold Requirements for Renewal Projects

HUD assumes renewal projects, including renewing YHDP, meet project eligibility and quality threshold requirements because of previously approved grant applications, unless information to the contrary is received (e.g., monitoring findings, results from investigations by the Office of Inspector General, the recipient routinely does not draw down funds from eLOCCS at least once per quarter, consistently late APR submissions.) and/or if the renewal project has compliance issues which results in the project not operating in accordance with 24 CFR part 578. Eligibility threshold is determined on a pass/fail basis, and **if standards are not met, the project will be rejected from the competition.**

In addition, renewal projects must meet minimum project eligibility, capacity, timeliness, and performance standards identified in this NOFO or they will be rejected from consideration for funding.When considering renewal projects for award, HUD will review information in eLOCCS; Annual Performance Reports (APRs); and information provided from the local HUD/CPD Field Office, including monitoring reports and audit reports as applicable, and performance standards on prior grants, and will assess projects using the following criteria on a pass/fail basis:

- Whether the project applicant's performance met the plans and goals established in the initial application as amended
- Whether the project applicant demonstrated all timeliness standards for grants being renewed, including that standards for the expenditure of grant funds have been met
- The project applicant's performance in assisting program participants to achieve and maintain

independent living and record of success, except HMIS-dedicated projects are not required to meet this standard; and

- Whether there is evidence that a project applicant has been unwilling to accept technical assistance, has a history of inadequate financial accounting practices, has indications of project mismanagement, has a drastic reduction in the population served, has made program changes without prior HUD approval, or has lost a project site.

HUD reserves the right to reduce or reject a funding request from the project applicant for the following reasons:

- Outstanding obligation to HUD that is in arrears or for which a payment schedule has not been agreed upon
- Audit finding(s) for which a response is overdue or unsatisfactory
- History of inadequate financial management accounting practices
- Evidence of untimely expenditures on prior award
- History of other major capacity issues that have significantly affected the operation of the project and its performance
- History of not reimbursing subrecipients for eligible costs in a timely manner, or at least quarterly; and
- History of serving ineligible program participants, expending funds on ineligible costs, or failing to expend funds within statutorily established timeframes.

Funding Levels & Limits

Each year's NOFO states how the renewal amount is to be calculated. This year, these rules apply:

- Applicants requesting renewal of grants for rental assistance are permitted to request a per-unit amount less than the Fair Market Rent (FMR) if the actual rent per unit under lease is less than the FMR (but not more than). This will help reduce the number of projects receiving rental assistance that have large balances of unspent funds remaining at the end of the operating year. Renewal project applicants must ensure the amount requested will be sufficient to cover all eligible costs as HUD cannot provide funds beyond the amount awarded through this Competition. Project applications for rental assistance cannot request more than 100 percent of the published FMR.
    - The applicant must provide copies of the leases to establish the actual rents.
- HUD will adjust leasing, operating, and rental assistance budget line items based on changes to the Fair Market Rents (FMR). Because the application submission deadline falls in FY 2022, HUD will use FY 2022 FMRs for funding amounts.
- To request increased funding to a higher level of services/housing than the previous grant, the applicant must submit a **new** application for any proposed expansion and renewal application to renew the existing project. See **New Projects: Designing Your Project** above.
- If the recipient has a subrecipient, it is required to share at least 50% of project administrative funds with its subrecipient(s).

Funding Term

- All CoC program renewal, YHDP renewal and YHDP replacement projects are eligible to apply for one year of renewal funding.

Match Requirement

- See match requirements , match ideas, and model match letter.

Eligible Costs to Inform Project Design

Information about eligible costs under each line item can be found in the CoC Program Interim Rule, 24 CFR 578 and in the associated HUD Resource Binder and Indirect Cost Toolkit.

NOTE: Projects often have additional limitations beyond those in the Interim Rule, due to their project design or the NOFO under which they were originally funded.

A few things to highlight because they have **changed in recent years** include:

- Program income can be used at match. Program income must always be used for eligible activities under the grant.
- Tenant-based Rental Assistance is rental assistance in which program participants choose housing of an appropriate size in which to reside, and certain households with domestic violence experience have been able to retain the assistance outside the CoC's area. Other program participants may also choose housing outside the CoC's geographic area. If the recipient is able to meet all CoC requirements in the area where the participant chooses housing. If unable to meet the requirements, the recipient may refuse to permit the participant to retain TBRA if the participant moves outside of the geographic area.
- Indirect costs (also known as "facilities and administrative costs" defined at 2 CFR 200.56) are eligible under the CoC Program, and if the applicant does not have an approved federally negotiated indirect cost rate, the applicant may use a de minimis rate of 10 percent of Modified Total Direct Costs. Additional information on Indirect Costs can be found in the HUD Indirect Costs Toolkit.

Also remember:

- Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible supportive services costs. Some limited training is eligible under administrative costs, however.
- Operating costs do not include operating costs of emergency shelters and supportive services only facilities, maintenance and repair of housing where those costs are included in the lease (landlord responsibilities), or a structure or unit also subsidized by rental assistance funds.
- Administrative costs do not include staff and overhead costs directly related to carrying out other eligible activities (e.g., rental assistance), because those costs are eligible as part of those activities.

- Time spent preparing the annual application to HUD is **not** an eligible use of CoC project funds (it is, however, an eligible use of CoC planning grant funds).

Program Requirements

Participative Planning and Implementation

Applicants must identify the steps they will take to ensure that traditionally marginalized populations (such as racial and ethnic minorities and persons with disabilities) will be able to meaningfully participate in the planning process. The applicant must identify the specific populations that it will include, identify community organizations that represent these populations, and describe how these populations will be included in the planning process.

For capital investment projects, grantees should commit to and demonstrate plans to employ low-income and very low- income persons and/or utilize Section 3 businesses at levels beyond those required by Section 3.

In seeking public participation, applicants and recipients must ensure that all communications are provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities. In addition, grantees must take reasonable steps to ensure meaningful access to services, programs, and activities by persons with Limited English Proficiency (LEP persons).

Match Requirements

- See match requirements , match ideas, and model match letter.

Examples of Later Responsibilities for Recipients and Subrecipients

If your application is conditionally awarded, you will have a number of responsibilities. **Please be sure that you are capable of carrying all of them out before submitting your application.** The list that follows includes some of the recipient/subrecipient responsibilities. These requirements are detailed in the CoC Program NOFO and the CoC Interim Program Rule (24 CFR 578). **All grant recipients and subrecipients should read these documents carefully.**

All Projects

- **Annual Audits:** Any recipient expending $750,000 or more in a year in Federal Funds must conduct a single audit for that year.
- **Reporting:**

- **Annual Performance Reports (APR):** Your agency will be responsible for submitting an APR for each project every year, which provides client data, service utilization information, program outcomes, and financial information. HUD may terminate the renewal of any grant and require repayment if the APR is not filed on time or if HUD deems the APR unacceptable or showing noncompliance with grant requirements
- **Record-keeping:** Recipients must maintain records and within the timeframe required, make any reports, including those pertaining to race, ethnicity, gender, and disability status that HUD may require. CoC applicants may report this data as part of their APR submission to HUD.
- **Transparency Act:** Award notices may also include requirements for sub-award reporting in compliance with the requirements of the Federal Financial Assistance Accountability and Transparency Act of 2006 (Pub. L. 109-282) (Transparency Act) and Section 872 of the Duncan Hunter National Defense Authorization Act for Fiscal Year 2009 (Pub. L. 110-417)

- **Impact/Success Indicators:** All projects, except for HMIS, must provide systematic indicators for evaluating the positive impact/success the project will have on clients and reducing homelessness in the community. HUD will require projects to include measures for: length of time in the project; recidivism; movement to and stability in permanent housing; connection with mainstream benefits; and job and income growth for persons who are homeless. Projects may also indicate additional measures on which the project will chart success.
- **Other Data Requests:** Your agency must provide performance and other requested data to the CoC for community-level analysis and planning.
- **Match Documentation:** Your agency must maintain documentation of any required match funding in your financial reports on a grant-specific basis.
- **HMIS Participation:** Your agency must participate in the CoC's Homeless Information Management System and enter data consistent with the applicable HMIS Data Standards.
- **Performance**: Your agency must perform the tasks outlined in your application and grant agreement, including complying with all of the language in the Applicant Certifications, and following all HUD statutes and regulations applicable to the grant.
- **Documentation of Homeless Status and Disability Status:** HUD requires all recipients to document the homeless status, and in some cases the disability status, for all clients.
- **Housing Related Requirements:** HUD required recipients to ensure: compliance with HQS, that housing is appropriate to the needs of the persons served, suitable dwelling size, and that housing rental amount is within HUD's guidelines.
- **Service-Related Requirements:** All programs must provide ongoing assessment of supportive services.

- **Fair Housing:** HUD requires compliance with requirements related to Fair Housing and Equal Opportunity, Equal Access to Housing, and Resolution of Outstanding Civil Rights Matters. This includes outreach to underserved populations, including those with Limited English Proficiency.
- **Calculation of Client Rent:** HUD determines the amount of rent that can be charged to clients, and recipients must show documentation of rental calculations.
- **No program fees:** Recipients and subrecipients may not charge program participants program fees.
- **Policies:** All CoC recipients are required to institute certain policies including: participant participation, grievance procedures, due process for participant termination, staff rules, emergency safety and evacuation procedures, confidentiality restrictions, non-discrimination, free from religious influences, conflict of interest, anti-lobbying, drug-free workplace, etc.
- **State and Local Requirements:** Services provided with CoC program funds must be provided in compliance with all applicable State and local requirements, including licensing requirements.
- **Mainstream Resources:** You must coordinate and integrate your program with other mainstream health, social services and employment programs for which your clients may be eligible
- **Prevention and Discharge Planning:** Any governmental entity serving as an applicant must agree to develop and implement to the maximum extent practical and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care other youth facilities, or corrections programs and institutions) in order to prevent such discharge from immediately resulting in such persons entering the homeless system.
- **Coordination with Educational Agencies:** Any program serving homeless families will have to certify that their programs will establish policies and practices that are consistent with, and do not restrict the exercise of rights provided by the education subtitle of the McKinney Vento Act and other laws relating to the provision of education and related services to individuals and families experiencing homelessness. They must also designate a staff person to ensure that children are enrolled in school and connected to appropriate services within the community.
- **Ethics:** Recipients and subrecipients must not be debarred or suspended, not have delinquent federal debts, conduct business in accordance with core values and ethical standards/code of conduct.
- **Some Pre-Contract Requirements for New Projects:**
    - Proof of site control, match, environmental review, and the documentation of financial feasibility must be completed within 12 months of the announcement of the award, or 24 months in the case of funds for acquisition, rehabilitation, or new construction. The 12-month deadline may be extended by HUD for up to 12 additional months upon a

showing of compelling reasons for delay due to factors beyond the control of the recipient or subrecipient.

- **Use Covenants:** All grants of funds for acquisition, rehabilitation or new construction require recordation of a HUD-approved use and repayment covenant requiring operation of the program for 15 years.
- **Environmental Review:** All grants for acquisition, rehabilitation, conversion, leasing, repair, disposal, demolition, or construction must demonstrate that the project site is free of hazardous materials that could affect the health and safety of the occupants.
- **Section 3 Compliance:** Projects using housing assistance funding for housing rehabilitation (including reduction and abatement of lead-based paint hazards, but excluding routine maintenance, repair and replacement) or housing construction, are subject to Section 3 of the Housing and Urban Rehabilitation Act of 1968.
- **Building Codes:** Housing and facilities constructed or rehabilitated with assistance under this part must meet State or local building codes, and in the absence of State or local building codes, the International Residential Code or International Building Code (as applicable to the type of structure) of the International Code Council
- **Other like requirements** (e.g., lead based paint, environmental requirements, real property acquisition and relocation, etc.)

Timeliness

All projects must adhere to certain timeliness standards in order to receive this funding.

- Recipients conditionally awarded funds in the 2022 CoC funding round must be obligated by September 30, 2024 and spent by September 30, 2029. However, grant terms and timeliness standards may require shorter timelines.
- Recipients must draw down funds at least once per quarter of the program year, after eligible activities commence.

Completing an Application in HUD's Web-Based Application System: e-snaps

HUD requires application submission through the web-based e-snaps system. The e-snaps website is https://esnaps.hud.gov/grantium/frontOffice.jsf.

Over 600 pages of training modules, navigational guides, and detailed instructions can be accessed on this webpage:

https://www.hudexchange.info/programs/e-snaps/

The following e-snaps guides are available on that website:

Application Resources for All CoC Program Project Types

- Project Applicant Profile Navigational Guide
- How to Complete the HUD Form 2880 in e-snaps
- Applying for DedicatedPLUS Projects
- Homelessness and Supportive Housing Eligibility Chart
- DUNS to Unique Entity Identifier Transition

Submitting Applications for Project Funding (Note: Yellow highlighted links are to 2021 resources, pending release of 2022 HUD guidance)

- E-SNAPS 101 Toolkit
- How to Access the Project Application
- Transferring an Existing Project
- How to Complete the HUD Form 2880 in e-snaps
- Renewal Project Application Detailed Instructions
- Renewal Project Application e-Snaps Navigational Guide
- New Project Application Detailed Instructions
- New Project Application e-Snaps Navigational Guide

Special Topics

- Consolidating Projects
- Transitioning Projects
- Applying for DV Bonus Projects
- Expanding Projects
- YHDP Renewal Projects

Some e-snaps tips:

- Your agency must have at least one person on staff who is able to access and enter data into e-snaps. It is preferable to have two people on staff with access but having more than two can lead to confusion and errors.
- e-snaps is the HUD system; it is the channel through which your application(s) will be transmitted to HUD at the end of the competition. It may NOT be the system for the local competition.
- The e-snaps system is not always user-friendly or glitch-free. It is likely that you will encounter some problems along the way. Do not hesitate to contact your Homebase Local Team members if you have problems with e-snaps. That said, many problems can be avoided by following the instructions closely and relying upon the navigational guides and detailed instructions listed above, and by using the correct internet browser
- Similar to prior years, renewal project applicants (for grants that have renewed at least once) may submit their renewal project applications with no changes on select screens.

Applicant Profile

Complete the Applicant Profile portion of e-snaps utilizing this Navigational Guide.

Quick Applicant Profile Tips:

- Before you can access the online location where you complete the Project Application, you must complete and submit the Applicant Profile and related documents. DO NOT ATTEMPT TO GO DIRECTLY TO YOUR PROJECT APPLICATION. If you get there, there is likely a mistake and you will probably have to retrace your steps.
- Although you only need one Applicant Profile per agency (in almost all cases), you will need to complete a Project Application for each project.
- If you are applying for a new project and a renewal project, you will need to register for multiple funding opportunities within your Applicant Profile. If you have multiple funding opportunities, make sure to create the project application under the correct Funding Opportunity name.
- The "Complete" button on the Applicant Profile must be selected within the timeframe of the competition period. Therefore, when you log in the first time during this NOFO period, even if there is a statement "This e.Form has been marked as complete," you MUST put the forms in edit-mode (select the Edit button on the Submission Summary page) and then select the "Complete" button again.
- All required attachments must be uploaded before the Project Applicant will be able to access the Project Application. Please make sure all attachments are current before submitting your application.

Organization Information: SAM & UEI

You need to have a Unique Entity Identifier (UEI) number and complete or renew your registration the System for Award Management (SAM) (the successor to CCR) to enter into a grant agreement with HUD. The SAM website is www.sam.gov. Sam.gov requires several steps in its registration process due to fraud, including submission of notarized letters. If your agency needs to register, please update your SAM Registration early in the application process as it can take multiple weeks to complete the process. UEI numbers must also be registered and active on www.sam.gov.

Additional Information: Code of Conduct

Applicants are required to develop and maintain a written code of conduct. Consistent with regulations governing specific programs, your code of conduct must prohibit real and apparent conflicts of interest that may arise among officers, employees, or agents; prohibit the solicitation and acceptance of gifts or gratuities by your officers, employees, or agents for their personal benefit in excess of minimal value; and outline administrative and disciplinary actions available to remedy violations of such standards.

Simply stated, the Code of Conduct:

- Must prohibit the solicitation and acceptance of gifts or gratuities by officers, employees, and agents for their personal benefit in excess of minimal value;
- Outline administrative and disciplinary actions available to remedy violations of such standards,

- Describe the method to be used to ensure that all officers, employees and agents of the organization are aware of the Code of Conduct, and
- Must be written on company letterhead that provides a mailing address, authorized official name, and telephone number.

All applicants for HUD funding must have a Code of Conduct on file with HUD. An applicant is prohibited from receiving an award of funds from HUD if it fails to meet this requirement for a Code of Conduct.

An applicant who previously submitted an application and included a copy of its code of conduct ***will not*** be required to submit another copy if

- The applicant is listed on HUD's Web site, **and**
- If the information (e.g. name of organization, authorized official) has not been revised.

An applicant ***must include*** a copy of its code of conduct if the information listed on the above website has changed, e.g.,

- The person who submitted the previous application is no longer your authorized organization representative,
- The organization has changed its legal name or merged with another organization, or
- The address of the organization has changed.

Before entering into an agreement with HUD, an applicant awarded assistance under a HUD program NOFO will be required to submit a copy of its code of conduct and describe the methods it will use to ensure that all officers, employees, and agents of its organization are aware of its code of conduct.

HUD FORM 2880: Applicant/Recipient, Disclosure/Update Report

A Project Applicant is **required** to complete HUD form 2880 to complete the Applicant Profile. Please see the "How to Complete the HUD Form 2880 in e-snaps" form.

Non-Profit Documentation

Where is it? In your agency's records.

What is it?

- A copy of the IRS ruling providing tax-exempt status under section 501(c)(3) of the IRS Code; or
- Documentation showing that the applicant/sponsor is a certified United Way agency; or
- A certification from a licensed CPA that no part of the net earnings of the organization inures to the benefit of any member, founder, contributor, or individual; that the organization has a voluntary board; that the organization practices nondiscrimination in the provision of assistance; and that the organization has a functioning accounting system that provides for each of the following (mention each in the certification):

- (a) Accurate, current and complete disclosure of the financial results of each federally sponsored project.
- (b) Records that identify adequately the source and application of funds for federally sponsored activities.
- (c) Effective control over and accountability for all funds, property and other assets.
- (d) Comparison of outlays with budget amounts.
- (e) Written procedures to minimize the time elapsing between the transfer of funds to the recipient from the U.S. Treasury and the use of the funds for program purposes.
- (f) Written procedures for determining the reasonableness, allocability and allowability of costs.
- (g) Accounting records, including cost accounting records, which are supported by source documentation.

- Letter from authorized state official showing applicant as organized and in good standing as a public nonprofit organization

Short List of All Attachments to e-snaps

Each applicant completes, in e-snaps, an applicant profile (the SF-424 Application for Federal Assistance) and then a project application (including various Federal forms) for each project. This list summarizes the other documents that need to be uploaded to e-snaps.

Attached to Applicant Profile

- Applicant Code of Conduct (not required if listed on HUD website)
- Nonprofit Documentation of Applicant Eligibility (for non-profits only; e.g., 501(c)(3) letter)
- Survey on Equal Employment Opportunity (for non-profits; optional)
- (Only if applicant is requesting indirect costs AND has an approved federally negotiated indirect cost rate) Approved Indirect Cost Rate Proposal

If your project expends funds in the geographic area of one or more other CoCs, please talk to Homebase Local Team as an additional attachment may be required.

Attached to Project Application

- Documentation of Subrecipient Eligibility (e.g., 501(c)(3) letter)

Registering for Project Application Funding Opportunity

The final steps before you begin your Project Application are registering for the funding opportunity. Follow the instructions in the Project Application training module and/or review the "How to Access the Project Application" guide.

Completing the Project Application

Please see the HUD materials to support your completion of the Project Application:

- Renewal Project Application Detailed Instructions
- Renewal Project Application e-Snaps Navigational Guide
- New Project Application Detailed Instructions
- New Project Application e-Snaps Navigational Guide

Executive Order 12372 and SF-424 Form

Executive Order 12372, "Intergovernmental Review of Federal Programs," was issued with the desire to foster the intergovernmental partnership and strengthen federalism by relying on State and local processes for the coordination and review of proposed Federal financial assistance and direct Federal development. The Order allows each State to designate an entity to perform this function. For example, California elected to participate in the intergovernmental review process and designated the State Clearinghouse of the Office of Planning and Research as the entity to perform that function and project applicants must now submit their SF-424 form (exported from e-snaps) to the State website found here: http://cfda.opr.ca.gov/#/

Please ask your Homebase Local Team member or review the local cover page if you need more information about what's required of you to comply with this requirement.

HUD Resources

- **2022 CoC NOFO:** https://www.hudexchange.info/programs/e-snaps/fy-2022-coc-program-nofa-coc-program-competition/
- **CoC Program Interim Rule (24 CFR part 578):** https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml#seqnum578.99
- **CoC Competition Question Guidance and Email Addresses:** https://www.hudexchange.info/programs/e-snaps/#getassistance
    - Questions about the CoC Program Competition must be submitted to the appropriate HUD.gov email address, as follows: **CoCNOFO@hud.gov** for questions about the NOFO, competition, and applications.**e-snaps@hud.gov** for questions about e-snaps technical

issues, including creating an individual user profile, lockouts/password resets, requesting access to a CoC's or project applicant's e-snaps account, navigating e-snaps, updating the Applicant Profile, identifying the funding opportunity, creating a project, and accessing the application on the Submissions screen.

- **HUD Websites:**
  - www.hud.gov
  - www.hudexchange.info

- **Funding Application (e-snaps application system):** https://esnaps.hud.gov/

- **E-snaps Resources:** https://www.hudexchange.info/programs/e-snaps/

- **Training and Resources:** www.hudexchange.info/homelessness-assistance/

- **HUD Exchange Ask A Question (AAQ):** https://www.hudexchange.info/program-support/my-question/

- **General Administrative Requirements and Terms for HUD Financial Assistance Awards:** https://www.hud.gov/sites/dfiles/SPM/documents/GeneralAdministrationRequirementsand%20TermsforHUDAssistanceAwards2.pdf